

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

SEALED PLAINTIFF 1)	
)	
and)	
)	
SEALED PLAINTIFF 2,)	
)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 3:22-cv-00670-MHL
)	
PATRIOT FRONT, <i>et al.</i>,)	
)	
)	
Defendants.)	

**REQUEST FOR CLERK’S ENTRY OF DEFAULT
AGAINST PATRIOT FRONT AND THOMAS ROUSSEAU**

Pursuant to Federal Rule of Civil Procedure 55(a), Plaintiffs, by counsel, respectfully request that the Clerk of the Court enter default against Defendants Patriot Front and Thomas Rousseau (collectively “Defendants”) based on their failure to answer, plead, or otherwise defend in this civil action. In support of this request, Plaintiffs state as follows:

1. Plaintiffs filed their Complaint against Defendants on October 18, 2022 (ECF No. 1).
2. Copies of the original Complaint with summonses were served on Defendants on December 21, 2022, via posting on the front door of Defendant Rousseau’s home address (ECF Nos. 89 & 90).
3. On December 5, 2022, Plaintiffs filed an Amended Complaint against Defendants (ECF No. 31).

4. The Clerk of the Court issued summonses as to Defendants on December 19, 2022 (ECF No. 43).

5. On January 5, 2023, the Secretary of the Commonwealth of Virginia filed certificates of compliance confirming that Defendants were served with copies of the Amended Complaint and summonses through service upon the Secretary of the Commonwealth, as statutory agent for service in accordance with Virginia Code § 8.01-329 (ECF Nos. 52 & 53).

6. In accordance with Federal Rule of Civil Procedure 12(a)(1)(A), Defendants' answer or other response was due no later than January 26, 2023. No such answer or other response has been filed or served (*see* accompanying Shebelskie Decl. ¶ 8).

For the reasons set forth above, Plaintiffs respectfully request that the Clerk of the Court enter default against Defendants Patriot Front and Thomas Rousseau as to all claims asserted by Plaintiffs.

Date: July 24, 2023

Respectfully submitted,

SEALED PLAINTIFFS 1 and 2

By: /s/ Michael R. Shebelskie

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of Plaintiffs' Request for Clerk's Entry of Default Against Patriot Front and Thomas Rousseau was filed on July 24, 2023 through the CM/ECF system and that true and correct copies of this filing and supporting documents were sent by first-class mail, postage pre-paid, to the following:

Patriot Front c/o Thomas Rousseau
714 Highview Lane
Grapevine, TX 76051

Thomas Rousseau
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